

1 Jared R. Richards, Esq.  
2 Nevada Bar No. 11254  
3 Dustin E. Birch, Esq.  
4 Nevada Bar No. 10517  
5 CLEAR COUNSEL LAW GROUP  
6 1671 W. Horizon Ridge Pkwy, Suite 200  
7 Henderson, Nevada 89102  
8 Telephone No.: (702) 476-5900  
9 Facsimile No.: (702) 924-0709  
10 jared@clearcounsel.com  
11 dustin@clearcounsel.com  
12 *Attorneys for Plaintiff*  
13 *Alejandro Rosales*

14 UNITED STATES DISTRICT COURT

15 DISTRICT OF NEVADA

16 ALEJANDRO ROSALES, individually

17 Plaintiff, CASE NO.: 2:21-cv-01973-JCM-BNW

18 vs.

19 OFFICER BELL-BRANDZ, OFFICER  
20 MCCARY; OFFICER PELAYO; OFFICER  
21 GARCIA; OFFICER VON GOLDBERG;  
22 OFFICER BUTIN; OFFICER DEMARINIS;  
23 and DOE OFFICERS I - XX,,

24 Defendants.

25 **STIPULATION AND ORDER TO EXTEND**  
**PLAINTIFF'S OPPOSITIONS TO LVMPD**  
**DEFENDANTS' MOTION TO DISMISS**  
**FOR FAILURE TO PROSECUTE, OR**  
**ALTERNATIVELY, MOTION FOR**  
**JUDGMENT ON THE PLEADINGS**

26 **(FIRST REQUEST)**

27 COMES NOW, Plaintiff, Alejandro Rosales, by and through his attorneys of record, Jared  
28 R. Richards, Esq. and Dustin E. Birch, Esq. of Clear Counsel Law Group, and Defendants, Officer  
1 Officer Bell-Brandez, Officer McCary, Officer Pelayo, Officer Garcia, Officer Von Goldberg, Officer  
2 Butin, and Officer Demarinis, collectively ("LVMPD Defendants"), by and through their counsel  
3 of record, Craig Anderson, Esq. of Marquis Aurbach hereby agree and jointly stipulate the  
4 following.

5 1. LVMPD Defendants filed their Motion to Dismiss for Failure to Prosecute, or

alternatively, Motion for Judgment on the Pleadings on July 31, 2024 [EFC No. 50 and 51];

2. Plaintiff's counsel has been sick and needs additional time to properly respond and  
3 is unable to meet the deadline of August 14, 2024 currently scheduled for Plaintiff's Opposition to  
4 Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on  
5 the Pleadings;

6. The Parties have agreed to a seven (7) day extension for Plaintiff's Opposition to  
7 Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on  
8 the Pleadings;

9. Accordingly, the deadline for Plaintiff's Opposition to Defendants Motion to  
10 Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on the Pleadings, currently  
11 due on August 14, 2024, be extended to and including Wednesday, August 21, 2024;

12. This is the Parties' first request to extend the deadline to Plaintiff's Opposition to  
13 Defendants Motion to Dismiss for Failure to Prosecute, or alternatively, Motion for Judgment on  
14 the Pleadings; and

15. This Stipulation is being entered in good faith and not for purposes of delay.

16. IT IS SO STIPULATED.

17. Dated this 12th day of August, 2024.

18. CLEAR COUNSEL LAW GROUP

19. */s/ Dustin E. Birch*

20. Jared Richard, Esq.  
21. Nevada Bar No. 11254  
22. Dustin E. Birch, Esq.  
23. Nevada Bar No. 10517  
24. 1671 W. Horizon Ridge Pkwy, Suite 200  
25. Henderson, NV 89012  
26. *Attorneys for Plaintiff Alejandro Rosales*

27. Dated this 12th day of August, 2024.

28. MARQUIS AURBACH

29. */s/ Criag R. Anderson*

30. Craig R. Anderson, Esq.  
31. Nevada Bar No. 6882  
32. 10001 Park Run Drive  
33. Las Vegas, Nevada 89145  
34. *Attorneys for Defendants Officer Bell-*  
35. *Brandez, Officer McCary, Officer Pelayo,*  
36. *Officer Garcia, Officer Von Goldberg, Officer*  
37. *Butin, Officer Demarinis*

## **ORDER**

The above Stipulation is hereby GRANTED.

IT IS SO ORDERED.

James C. Mahan  
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT JUDGE

DATED: August 14, 2024